

REMARKS

Consideration of the above-identified application in view of the foregoing amendments and following remarks is respectfully requested.

Claim Status

Claims 1, 4, 8 and 9 are pending in this application and were previously rejected. Claims 1 and 4 are amended. No new matter has been introduced.

Claim Rejections – 35 U.S.C. § 102

Claims 1, 4, 8 and 9 were previously rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 4,378,610 to Ermer *et al.* (“Ermer”).

The claimed present invention is believed different from Ermer in at least the following regards and Ermer does not teach or suggest at least such aspects of the present invention as required by independent method claim 1 and corresponding apparatus claim 4.

Specifically, amended claim 1 recites that “the conducting members ... are capable of advancing and retreating in a direction substantially perpendicular to the cleaning target” and that the conducting member move “in a direction substantially perpendicular to the cleaning target” to come into contact with portions of the cleaning target. Claim 4 has been amended to recite features similar to those now found in amended claim 1.

In contrast, Ermer teaches a cleaning device for cleaning a data carrier comprising brushes composed of electrically conductive fibers or filaments that are rotated to sweep the data carrier. Specifically, Ermer states that

In operation of the device, the brushes including the bristles 19 are driven by transmission of torque from the motor 18 via the gears 16, 17; the brushes rotate in directions counter to the direction of movement of the data carrier 27 which is advanced in the direction

of arrow 26 by means known per se and not specifically illustrated.
(Ermer, col. 4, lines 21-27).

Thus, Ermer does not teach or suggest moving the bristles “in a direction substantially perpendicular to the cleaning target,” as recited in the claims. Thus, Ermer neither discloses or suggests at least this aspect of the claims.

Applicant respectfully submits that the present invention as recited in independent claims 1 and 4, and claims 8 and 9 depending therefrom, are thus neither anticipated by nor rendered obvious in view of Ermer, taken alone or in combination with other art of record.

Applicant respectfully requests reconsideration and withdrawal of the rejections of claims 1, 4, 8 and 9 under 35 U.S.C. § 102(b).

Dependent Claims

Applicant has traversed, but not independently addressed the rejections of the dependent claims. Applicant submits that, in view of the amendments to the claims presented herein and, for at least similar reasons as to why the independent claims from which the dependent claims depend are believed allowable as discussed supra, the dependent claims, including new claims 8 and 9 are also believed allowable. Applicant however, reserves the right to address any individual rejections of the dependent claims should such be necessary or appropriate.

CONCLUSION

For the above-stated reasons, this application is respectfully asserted to be in condition for allowance. An early and favorable examination on the merits is requested. In the event that a telephone conference would facilitate the examination of this application in any way, the Examiner is invited to contact the undersigned at the number provided.

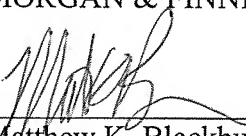
AUTHORIZATION

Should an extension of time be required to render this filing timely, such extension is hereby petitioned, and the Commissioner is hereby authorized to charge any additional fees which may be required for this Amendment, or credit any overpayment, to Deposit Account No. **13-4500**, Order No. 1232-5100.

Respectfully submitted,
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